

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

CHASE WILLIAMS AND WILLIAM
ZHANG, individually and on behalf of all
others similarly situated,

Plaintiffs,

v.

BLOCK.ONE, BRENDAN BLUMER, and
DANIEL LARIMER,

Defendants.

Civ. No. 1:20-cv-2809-LAK

CLASS ACTION

CRYPTO ASSETS OPPORTUNITY FUND
LLC and JOHNNY HONG, individually and
on behalf of all others similarly situated,

Plaintiffs,

v.

BLOCK.ONE, BRENDAN BLUMER,
DANIEL LARIMER, IAN GRIGG, and
BROCK PIERCE,

Defendants.

Civ. No.: 1:20-cv-3829-LAK

CLASS ACTION

**LEAD PLAINTIFF'S NOTICE OF MOTION FOR CERTIFICATION
OF THE PROPOSED CLASS; FINAL APPROVAL OF CLASS ACTION
SETTLEMENT; AND APPROVAL OF THE PLAN OF
ALLOCATION OF SETTLEMENT FUNDS**

TO: ALL PARTIES AND THEIR ATTORNEYS OF RECORD

PLEASE TAKE NOTICE that, upon the accompanying documents filed herewith:

1. Declaration of Daniel L. Berger in Support of Lead Plaintiff's Motion for Final Approval of Class Action Settlement and Approval of Plan of Allocation;

2. Declaration of Joseph Mahan Regarding (a) Media Campaign and Claims Package Dissemination, (b) Publication of the Summary Notice, (c) Report on Requests for Exclusion Received to Date; and

3. Memorandum in Support of Lead Plaintiff's Motion for (a) Certification of the Proposed Class and Appointment of Crypto Assets Opportunity Fund as Class Representative and Grant & Eisenhofer as Class Counsel; (b) Final Approval of Class Action Settlement; and (c) Approval of Plan of Allocation;

and all prior pleadings and proceedings had herein, Lead Plaintiff Crypto Assets Opportunity Fund LLC, by and through its attorneys, will move the Court, at a Hearing to be held on September 19, 2023 at 2:00 p.m., before the Honorable Lewis A. Kaplan, United States District Judge for the Southern District of New York, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, Room 21B, New York, NY 10007, for entry of the [Proposed] Final Judgment and Order of Dismissal with Prejudice providing for (1) Final Approval of Class Action Settlement, (2) Class Certification Pursuant to Rule 23 of the Federal Rules of Civil Procedure, and (3) Approval of Plan of Allocation.

DATED: New York, NY
July 25, 2023

Respectfully submitted,

/s/ Daniel L. Berger
Daniel L. Berger
Caitlin M. Moyna
Vincent J. Pontrello
GRANT & EISENHOFER P.A.
485 Lexington Avenue
New York, NY 10017
Tel.: (646) 722-8500
Email: dberger@gelaw.com
Email: cmoyna@gelaw.com
Email: vpontrello@gelaw.com

*Lead Counsel for the Class and Counsel for
Lead Plaintiff Crypto Assets Opportunity
Fund, LLC*

Ievgeniia P. Vatenko, Esq.
2 Northside Piers
Brooklyn, NY 11249
Tel.: (718) 451-6384
Email: jenny@vatrenkoesq.com

James Koutoulas
Koutoulas Law LLC
10 N. Dearborn
Chicago, IL 60604
Tel.: (312) 836-1180
Email: james@koutoulaslaw.com

J. Samuel Tenenbaum
**Bluhm Legal Clinic of the Northwestern
Pritzker School of Law
Complex Civil Litigation and Investor
Protection Center**
375 East Chicago Ave.
Chicago, IL 60611
Tel.: (312) 503-4808
Email: s-tenenbaum@law.northwestern.edu

*Additional Counsel for Crypto Assets
Opportunity Fund LLC*